

REMARKS

Summary

Claims 1 and 3-9 were pending, and all of the Claims were rejected in the Office Action on the basis of a previously cited and newly applied reference. Claims 10 and 11 have been introduced to further claim subject matter to which the Applicant is entitled. No new matter has been introduced. The Applicant has carefully considered the reference and reasons advanced by the Examiner and respectfully traverses the rejections, as the Examiner has not made out a *prima facie* case of anticipation. As such, the Applicant respectfully requests that the finality of the Office Action be reconsidered, and that the claims be allowed.

Claim Rejections

35 U.S.C. §102(b)

Claims 1 and 3-9 were rejected under 35 U.S.C. §102(b) as being anticipated by Fuse et al. (US Patent 4,642,693; "Fuse"). The rejections are respectfully traversed.

Claim 1 recites, *inter alia*, a plurality of converters that convert a luminance signal and two color-difference signals of an input video signal into digital signals, each digital signal corresponding to one of the luminance and color-difference signals, and a plurality of setting circuits that set magnitudes of reference voltage ranges to be identical in each of the converters, each setting circuit including a variable power supply to permit a contrast adjustment of picture images.

"Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, *arranged as in the claim.*" *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing *Connell v. Sears Roebuck & Co.* 722 F.2d 1542 220 USPQ 193 (Fed. Cir. 1983)) (emphasis added).

The Applicant respectfully submits that the reference does not anticipate the present subject matter as it does not identically describe the elements and their arrangement, as claimed in this application. Specifically, the characterization of the structures in the reference does not encompass the elements, limitations and arrangement of Claim 1.

Fuse appears to teach a means of digitizing a color television image in the RGB format only. RGB refers to the additive primary colors red, green, and blue that, when mixed together in equal amounts, create white light. In contrast, Claim 1 is an arrangement where the luminance signal and the two color difference signals are converted into digital signals. As typically used in television transmissions, the color palate is represented by the luminance and the two color-difference chrominance signals. This is an entirely different way of representing the color palate of an image. The reference does not have any teaching where the luminance and chrominance signals are processed.

Further, in the arrangement of Claim 1, the VH applied to each of the converters is varied, but the same voltage is applied to each converter. Fuse teaches that "the DC voltages at the nodes C and D shown in Fig 3(c) are determined by the resistors 22, 23, 24 and 25 and are supplied to the A/D converter 3 as the upper and lower reference potentials VH and VL." (Fuse, col. 3, lines 59-63), and "when the variable resistors 22 and 25, the upper and lower reference potentials are changed, thus adjusting contrast" (Id, col. 3, line 64, bridging col. 4, line 2). This aspect of the teaching describes a circuit element suitable for a single A/D converter channel. Fig 4 illustrates the application of this teaching to the A/D conversion of an RGB television signal. In this situation, the reference potential VH is applied to the R and B channels from the VCC through variable resistors 26a and 28a, respectively, and to the G channel by a fixed resistor (unlabeled). "Then, the controls of the generators 36 and 38 [that is, the variable resistors 26a and 28a] are adjusted so as to change the reference levels of the R and the B signals for the A/D converters without changing a reference level of the G signal...." (Id, col. 4, lines 33-35). Thus Fuse teaches that the reference potentials (VH, VL) applied to the converters of R and B channels are changeable independently of each other, and also with respect to the fixed voltages applied to the G channel. The only circumstance in which the voltages on VH of all of the RGB channels can be the same is if the resistors 26a and 28a are adjusted such that the voltages are equal. This is a single fixed voltage value. As such, the apparatus taught by Fuse cannot both have the voltages VH on all of the converters being both the same as recited in the arrangement of Claim 1, and also being variable to achieve a variation in contrast as

taught by Fuse (Id, col. 3, line 68, bridging col. 4, line 2). As such Fuse does not teach the limitation of the arrangement of Claim 1, where a variable power supply may be used to adjust the magnitudes of reference voltage ranges, which are identical in each of the converters, to permit a contrast adjustment of picture images.

For at least these reasons, the Applicant respectfully submits that the Examiner has not made out a *prima facie* case of anticipation, and that Claim 1 is allowable.

Claims 3-5 are dependent on Claim 1 and are allowable, without more.

Claim 6 contains the same recitation as Claim 1 and is not anticipated by Fuse for the same reasons. Claims 7-9 are dependent on Claim 6 and are allowable, without more.

New Claims

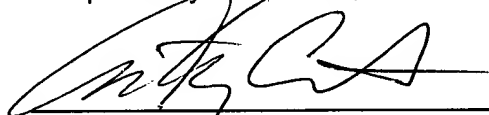
New Claims 10 and 11 have been introduced. Support for these claims can be found in Fig. 6 B and C, and at page 12 of the specification. In addition to being independently patentable, these claims are allowable, without more, as claims dependent on an allowable independent claim.

Conclusion

Claims 1 and 3-11 are pending. The Applicant respectfully submits that the pending claims are allowable and request that a Notice of Allowance issue.

The Examiner is respectfully requested to contact the undersigned in the event that a telephone interview would expedite consideration of the application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Anthony P. Curtis', is written over a horizontal line.

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